

Approved: Daniel G. Nessim
Daniel G. Nessim
Assistant United States Attorney

Before: HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York

ORIGINAL

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UNITED STATES OF AMERICA :

- v. - :

JOAO CORCINO, :

Defendant. :

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COMPLAINT

Violation of
21 U.S.C. § 846

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

RICHARD LAVORATO, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA") and charges as follows:

COUNT ONE
(Narcotics Conspiracy)

1. In or about October 2019, in the Southern District of New York and elsewhere, JOAO CORCINO, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JOAO CORCINO, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that JOAO CORCINO, the defendant, conspired to distribute and possess with intent to distribute were (i) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) mixtures and substances containing a detectable amount of gamma hydroxybutyric acid ("GHB"), in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

4. I am a Special Agent with the DEA and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, and my conversations with law enforcement officers, law enforcement employees, and witnesses, as well as a review of documents. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my participation in this investigation, including surveillance I conducted, my review of documents, and my conversations with other law enforcement officers, I have learned, in substance and in part, that:

a. Since at least in or about June 2019, I and other law enforcement officers have been investigating a drug trafficking organization (the "DTO") involved in transporting narcotics from Mexico, across the border into the Southwestern United States, and onward to the East Coast of the United States, including the New York City area. As part of this investigation, law enforcement identified a particular apartment (the "Apartment") in a multi-story apartment building (the "Building") located in the Washington Heights neighborhood of Manhattan. Law enforcement learned that an individual later identified as JOAO CORCINO, the defendant, was living in the Apartment.

b. On or about October 7, 2019, at approximately 6:30 p.m., I and other law enforcement officers approached CORCINO in the lobby of the Building. We identified ourselves as law

enforcement officers and asked CORCINO, in sum and substance, if he lived at the Apartment. CORCINO stated, in substance and in part, that he resided at the Apartment. CORCINO also provided law enforcement with his identification. Law enforcement asked whether CORCINO had any identification that indicated he resided at the Apartment. CORCINO replied, in substance and in part, that he had a letter addressed to his name at the Apartment's address, upstairs in the apartment.

c. CORCINO then took law enforcement upstairs to the Apartment and let law enforcement into the Apartment. At the Apartment, law enforcement observed, in plain view on a desk and windowsill in a room near the entrance to the Apartment, gram bags of a substance that appeared to be methamphetamine as well as pipes that appeared to be used to smoke methamphetamine. Law enforcement asked CORCINO for consent to search the Apartment, and CORCINO provided both written and verbal consent.

d. During the search of the Apartment, law enforcement officers found approximately 23 16-to-20 ounce bottles of a substance that appeared, based on my training and experience, to be GHB (the "GHB Bottles").

e. CORCINO identified to law enforcement a bag stored in a closet at the Apartment that he had received from a co-conspirator ("CC-1"). Law enforcement located this bag (the "Bag") and found that it contained two packages of a bulk substance that, based on my training and experience, resembled methamphetamine (the "Bag Packages"), as well as a number of smaller gram-size bags containing what appeared, based on my training and experience, to be the same substance.

f. CORCINO was placed under arrest, advised of his *Miranda* rights, and waived those rights. CORCINO stated, in substance and in part, that the GHB Bottles contained GHB, that people use GHB to have sex, and the CC-1 brought the GHB to the Apartment. CORCINO also stated, in substance and in part, that CC-1 provides CORCINO with a bag, similar to the recovered Bag, to hold every two to three months and that CORCINO understands these bags to contain methamphetamine. CORCINO further stated, in substance and in part, that he occasionally sells gram-bag quantities of methamphetamine in order to supplement his income. CORCINO provided law enforcement with consent to search his cellular phone, which contained conversations reflecting CORCINO's sale of methamphetamine.

g. The Bag Packages were subsequently field tested and returned a positive test for the presence of methamphetamine.

WHEREFORE, deponent respectfully requests that JOAO CORCINO, the defendant, be imprisoned or bailed, as the case may be.



Richard Lavorato
Special Agent
Drug Enforcement Administration

Sworn to before me this
8th day of October, 2019



THE HONORABLE ONA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK